UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

IME WATCHDOG, INC.,

Plaintiffs,

Civil Action No.: 1:22-cv-1032

-against –

SAFA ABDULRAHIM GELARDI, VITO GELARDI, and IME COMPANIONS, LLC, SO ORDERED STIPULATION AND PRELIMINARY INJUNCTION

Defendants.

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against –

CARLOS ROA and DANIELLA LEVI,

Third-Party Defendants.

Third-Party Plaintiffs Safa Gelardi and IME Companions, LLC and Third-Party Defendant Carlos Roa, through their undersigned counsel, hereby stipulate to the following;

1. Third-Party Carlos Roa is preliminarily enjoined and restrained from defaming or disparaging Third-Party Plaintiff Safa Gelardi and Third-Party IME Companions, LLC, or their goods, services or products, in any manner whatsoever, to any third party whosoever, during the pendency of this litigation subject to further Order by the Court. This injunction does not prohibit Mr. Roa from giving written or oral testimony in this matter or any other legal matter or pursuing any related or relevant legal matter or from consulting with his attorney or from making any truthful statements.

- 2. Carlos Roa enters into this stipulation solely due to the costs, uncertainty, and vexation of litigation without admission as to any wrongdoing.
- 3. Third-Party Safa Gelardi agrees not to seek attorney's fees or costs in connection with her Order to Show Cause for a Preliminary Injunction against Mr. Carlos Roa (ECF Docket No. 30).

Dated:	April 29, 2022

SO ORDERED:

/s/ Pamela K. Chen
Hon. Pamela K. Chen, U.S.D.J.